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GINA MADRID

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE

GINA MADRID,

Plaintiffs,

vs.

HAHN FAMILY WINES, ALEJANDRO
CORTEZ and DOES 1 through 100,

Defendants.

Case No. 5:20-cv-05401-NC

**JOINT STIPULATION AND ORDER
FOR DISMISSAL WITH PREJUDICE**

Trial Date: August 8, 2022

1 Plaintiff Gina Madrid (“Plaintiff”) and Defendants Hahn Family Wines and Alejandro
2 Cortes (“Defendants”) and through their counsel of record and pursuant to Federal Rule of Civil
3 Procedure 41(a)(1)(A)(ii) hereby respectfully stipulate, in consideration of a negotiated settlement
4 executed by them, to the Dismissal with Prejudice of this entire action, with each party to bear
5 her/its own attorney’s fees and costs.

6
7 Dated: June 8, 2022

JACKSON LEWIS P.C.

8
9 By: /s/ Mark S. Askanas
10 Mark S. Askanas
11 Robert Yang
Attorneys for Defendant
HAHN FAMILY WINES

12 *Mark S. Askanas, counsel for Defendant Hahn
13 Family Wines, authorized submission of his e-
14 signature on this document in writing, by e-mail
dated June 8, 2022

15 Dated: June __, 2022

GORDON REES SCULLY MANSUKHANI, LLP

16
17 By: /s/ John Drake Seger
18 John Drake Seger
19 Attorneys for Defendant
ALEJANDRO CORTES

20 *John Drake Seger, counsel for Co-Defendant
21 Alejandro Cortes, authorized submission of his e-
22 signature on this document in writing, by e-mail
dated ____

23
24 Dated: June __, 2022

LAW OFFICES OF J.B. WORKMAN

25
26 By: /s/ Jeffrey Bennett Workman
27 Jeffrey Bennett Workman
28 Attorneys for Plaintiff
GINA MADRID

ORDER

The stipulation is approved. The entire action, including all claims stated herein against all parties, is hereby dismissed with prejudice.

Dated: June 13, 2022

By: _____

HONORABLE
United States District Judge



4856-7752-2206, v. 1